



Order Filed on May 24, 2021
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

**Caption in Compliance with
D.N.J.LBR 9004-1**

STEWART LEGAL GROUP, P.L.

Formed in the State of Florida

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Attorney for Global Lending Services LLC

In re:

Jennifer L. Hayes-Morris

aka Jennifer L. Hayes

Debtor.

Chapter: 13

Case No.: 19-21289-JNP

Hearing Date: May 25, 2021

Judge Jerrold N. Poslusny, Jr.

**CONSENT ORDER RESOLVING MOTION
TO VACATE AUTOMATIC STAY AND CO-DEBTOR STAY**

The relief set forth on the following pages is hereby **ORDERED**.

DATED: May 24, 2021

A handwritten signature in dark ink, appearing to read "Jerrold N. Poslusny, Jr.", is written over a horizontal line.

Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court

Debtor: Jennifer L. Hayes-Morris
Case No.: 19-21289-JNP
Caption of Order: **CONSENT ORDER RESOLVING MOTION TO VACATE
AUTOMATIC STAY AND CO-DEBTOR STAY**

THIS MATTER having been opened to the Court upon the Motion to Vacate Automatic Stay and Co-Debtor Stay (“Motion”) filed by Global Lending Services LLC (“Creditor”), and whereas the post-petition arrearage was \$2,035.02 as of May 19, 2021, and whereas the Debtor and Creditor seek to resolve the Motion, it is hereby **ORDERED**:

1. The automatic stay provided under 11 U.S.C. §362(a) shall remain in effect as to Movant’s interest in the following property: **2019 Jeep Cherokee; VIN: 1C4PJMCX9KD369625** (“Property”) provided that the Debtor complies with the following:

- a. Beginning on or before June 1, 2021, and continuing on the 1st day of each subsequent month until paid in full, the Debtor shall cure the post-petition arrearage namely, \$2,035.02 by making six (6) consecutive monthly payments of \$339.17 each; and
- b. The Debtor shall also resume making the regular contractual monthly payments directly to Creditor as each becomes due, beginning with the June 1, 2021 payment and continuing thereon per the terms of the underlying loan; and
- c. Remain current on all post-petition payment obligations, as well as all payments being paid through the Chapter 13 Plan.

2. The Debtor will be in default under the Consent Order in the event that the Debtor fails to comply with the payment terms and conditions set forth in above paragraphs and/or if the Debtor fails to make any payment due to Creditor under the Chapter 13 Plan.

3. All direct payments due hereunder not otherwise paid by electronic means and/or automatic draft, shall be sent directly to Creditor at the following address: **Global Lending Services LLC, 1200 Brookfield Boulevard, Sue 300, Greenville, SC 29603.**

4. If the Debtor fails to cure the default within thirty (30) days from the date of default, Creditor may submit a Certificate of Default to the Court on fourteen (14) days' notice to counsel for Debtor and the Chapter 13 Trustee for an order lifting the automatic stay imposed under 11 U.S.C. § 362(a) and permitting Creditor to exercise any rights under the loan documents with respect to the Property.

5. Creditor is awarded reimbursement of attorney fees and costs in the amount of \$250.00 and \$181.00, respectfully to be paid through the Chapter 13 Plan.

STIPULATED AND AGREED:



James DiMaggio, Esq.
Keaveney Legal Group
1000 Maplewood Drive, Suite 202
Maple Shade, NJ 08052
Counsel to Debtor

/s/Gavin N. Stewart

Gavin N. Stewart, Esq.
Stewart Legal Group, P.L.
401 East Jackson Street, Suite 2340
Tampa, FL 33602
Counsel to Creditor

In re:
Jennifer L. Hayes-Morris
Debtor

Case No. 19-21289-JNP
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-1
Date Rcvd: May 24, 2021

User: admin
Form ID: pdf903

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 26, 2021:

Recip ID	Recipient Name and Address
db	+ Jennifer L. Hayes-Morris, 77 Henry Ave, Elmer, NJ 08318-4133

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: May 26, 2021

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 24, 2021 at the address(es) listed below:

Name	Email Address
Denise E. Carlon	on behalf of Creditor Global Lending Services LLC dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Gavin Stewart	on behalf of Creditor Global Lending Services LLC bk@stewartlegalgroup.com
Isabel C. Balboa	ecfmail@standingtrustee.com summarymail@standingtrustee.com
Isabel C. Balboa	on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com summarymail@standingtrustee.com
John R. Morton, Jr.	on behalf of Creditor Santander Consumer USA Inc. dba Chrysler Capital ecfmail@mortoncraig.com mortoncraigecef@gmail.com
Michael A. Alfieri	on behalf of Creditor LYNX ASSETS SERVICES LLC vdumani@malfierilaw.com

District/off: 0312-1

User: admin

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Date Rcvd: May 24, 2021

Form ID: pdf903

Total Noticed: 1

Rebecca Ann Solarz

on behalf of Creditor Global Lending Services LLC rsolarz@kmlawgroup.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

Warren D. Levy

on behalf of Debtor Jennifer L. Hayes-Morris jday@keaveneylegalgroup.com
jdimaggio@keaveneylegalgroup.com;r46514@notify.bestcase.com;3295273420@filings.docketbird.com;casedriverecf@casedriver.com

TOTAL: 9